

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSH FRIEDMAN and JACALYN FRIEDMAN, individually and as h/w	:	Civil Action No.
<i>Plaintiffs</i>		:
v.		:
		:
WELLS FARGO BANK, N.A.; WELLS FARGO HOME MORTGAGE; WELLS FARGO CONSUMER LENDING; and JAMES LINNANE	:	
<i>Defendants</i>		:
		:

NOTICE OF REMOVAL OF DEFENDANTS
WELLS FARGO BANK, N.A., WELLS FARGO HOME MORTGAGE,
WELLS FARGO CONSUMER LENDING, AND JAMES LINNANE

Defendants Wells Fargo Bank, N.A., Wells Fargo Home Mortgage, Wells Fargo Consumer Lending, and James Linnane (collectively, the “Wells Fargo Defendants”), by their undersigned counsel, Fisher & Phillips LLP, submit this notice of removal pursuant to 28 U.S.C. §§ 1441 and 1446 to remove this action from the Philadelphia Court of Common Pleas, in which it is now pending at Docket No. 03897, October Term 2014 (the “Underlying Action”), to the United States District Court for the Eastern District of Pennsylvania and in support thereof aver as follows:

1. Plaintiffs Josh Friedman and Jacalyn Friedman (collectively, “Plaintiffs”) commenced the Underlying Action by filing a Writ of Summons on October 21, 2014. A true and correct copy of the Writ of Summons is attached hereto as Exhibit A.
2. On June 25, 2015, Plaintiffs filed a five count Complaint against the Wells Fargo Defendants. A true and correct copy of the Complaint is attached hereto as Exhibit B.

3. The claims asserted in the Complaint are as follows: (1) Count I – Invasion of Privacy – Intentional Tort; (2) Count II – Breach of Contract/Covenant of Good Faith and Fair Dealing; (3) Count III – Unjust Enrichment; (4) Count IV – Lanham Act; and (5) Count V – Loss of Consortium.

4. According to the Complaint, Plaintiffs are both adult individuals residing at 2315 Hartranft Street, Philadelphia, Pennsylvania 19145, meaning they are citizens of the Commonwealth of Pennsylvania. *See, e.g., Swiger v. Allegheny Energy, Inc.*, 540 F.3d 179, 182 (3d Cir. 2008) (“A natural person is deemed to be a citizen of the state where [he or] she is domiciled.”).

5. Defendant Wells Fargo Bank, N.A. is a national banking association and federally chartered bank. As such, it is a citizen of the state in which its main office is located, as set forth in its Articles of Association. *Wachovia Bank, N.A. v. Schmidt*, 546 U.S. 303 (2006). Defendant Wells Fargo Bank, N.A.’s main office is located in Sioux Falls, South Dakota. Accordingly, Wells Fargo Bank, N.A. is a citizen of the State of South Dakota.

6. Defendant Wells Fargo Home Mortgage is a non-existent entity without either a state of incorporation or a principal place of business.

7. Defendant Wells Fargo Consumer Lending is a non-existent entity without either a state of incorporation or a principal place of business.

8. Defendant James Linnane is a former Retail Division Sales Manager with Wells Fargo Bank, N.A. who had an office address of 1403 North Main Street, Wheaton, Illinois 60187 and currently resides in the State of Illinois. Accordingly, Defendant James Linnane is a citizen of the State of Illinois. *Swiger*, 540 F.3d at 182 (3d Cir. 2008).

9. None of the Wells Fargo Defendants are citizens of the Commonwealth of Pennsylvania.

10. Upon information and belief, Plaintiffs are seeking damages in excess of \$75,000.00 exclusive of interest and costs.

11. The Underlying Action is removable to this Honorable Court pursuant to 28 U.S.C. §§ 1332 and 1441(a) given that there is complete diversity of citizenship amongst Plaintiffs and the Wells Fargo Defendants and the amount in controversy exceeds \$75,000 exclusive of interest and costs.

12. The Underlying Action is also removal to this Honorable Court pursuant to 28 U.S.C. §§ 1331 and 1441(a) because a portion of Plaintiffs' claims arise under the Constitution, laws, or treaties of the United States. Specifically, the Lanham Act claim being asserted on behalf of Plaintiff Josh Friedman arises under the laws of the United States, namely 15 U.S.C. § 1051 *et seq.*

13. This Honorable Court may exercise supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. § 1337.

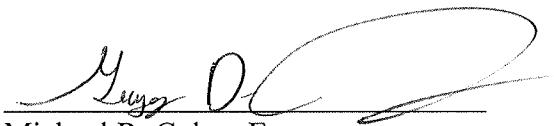
14. The Wells Fargo Defendants timely filed this Notice of Removal within thirty (30) of receiving a copy of the Complaint setting forth the claims upon which the Underlying Action is based. *See* 28 U.S. Code § 1446 ("[A] notice of removal of a civil action or proceeding shall be filed within 30 days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based. . . .").

15. In accordance with 28 U.S.C. § 1446(d), the Wells Fargo Defendants are also filing a copy of this Notice of Removal with the Prothonotary for the Philadelphia Court of Common Pleas.

WHEREFORE, Defendants Wells Fargo Bank, N.A., Wells Fargo Home Mortgage, Wells Fargo Consumer Lending, and James Linnane respectfully request that the Underlying Action be removed from the Philadelphia Court of Common Pleas to the United States District Court for the Eastern District of Pennsylvania.

FISHER & PHILLIPS LLP

Date: 7/22/15



Michael R. Galey, Esq.
Gregory D. Hanscom, Esq.
150 N. Radnor Chester Road, Ste. C300
Radnor, PA 19087
Telephone: (610) 230-2150
Facsimile: (610) 230-2151
mgaley@laborlawyers.com
ghanscom@laborlawyers.com

*Attorneys for Defendants
Wells Fargo Bank, N.A.,
Wells Fargo Home Mortgage,
Wells Fargo Consumer Lending, and
James Linnane*

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on July 22, 2015 a true and correct copy of the foregoing Notice of Removal, along with all attached materials, was served via e-mail and FedEx as follows:

Matthew B. Weisberg, Esq.

David A. Berlin, Esq.

Weisberg Law

7 South Morton Ave.

Morton, PA 19070



Gregory D. Hanscom, Esq.

EXHIBIT A

Court of Common Pleas of Philadelphia County

Trial Division

Civil Cover Sheet

Court of Common Pleas of Philadelphia County Trial Division Civil Cover Sheet		For Prothonotary Use Only (Docket Number) OCTOBER 2014 E-Filing Number: 1410065768 003897		
		DEFENDANT'S NAME WELLS FARGO BANK, N.A.		
PLAINTIFF'S ADDRESS 2315 HARTRANFT STREET PHILADELPHIA PA 19145		DEFENDANT'S ADDRESS 1700 WELLS FARGO CENTER SIXTH AND MARQUETTE MINNEAPOLIS MN 55402		
PLAINTIFF'S NAME JACALYN FRIEDMAN		DEFENDANT'S NAME WELLS FARGO HOME CENTER		
PLAINTIFF'S ADDRESS 2315 HARTRANFT STREET PHILADELPHIA PA 19145		DEFENDANT'S ADDRESS ONE HOME CAMPUS DES MOINES IA 50328		
PLAINTIFF'S NAME		DEFENDANT'S NAME WELLS FARGO CONSUMER LENDING		
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS ONE HOME CAMPUS DES MOINES IA 50328		
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 4	COMMENCEMENT OF ACTION <input type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input checked="" type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions		
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Non-Jury <input type="checkbox"/> Other:	<input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition	<input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals	<input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival
CASE TYPE AND CODE 2L - LIBEL, SLANDER, MISREPRESENT				
STATUTORY BASIS FOR CAUSE OF ACTION				
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) FILED PRO PROTHY OCT 31 2014 K. EDWARDS			IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>JOSH FRIEDMAN, JACALYN FRIEDMAN</u> Papers may be served at the address set forth below.				
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY MATTHEW B. WEISBERG		ADDRESS WEISBERG LAW, PC 7 S MORTON AVE MORTON PA 19070		
PHONE NUMBER (610) 690-0801	FAX NUMBER (610) 690-0880			
SUPREME COURT IDENTIFICATION NO. 85570		E-MAIL ADDRESS mweisberg@weisberglawoffices.com		
SIGNATURE OF FILING ATTORNEY OR PARTY MATTHEW WEISBERG		DATE SUBMITTED Friday, October 31, 2014, 01:34 pm		

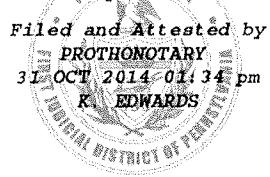
COMPLETE LIST OF DEFENDANTS:

1. JAMES LINNANE
ALIAS: C/O WELLS FARGO HOME MORTGAGE
ONE HOME CAMPUS
DES MOINES IA 50328
2. WELLS FARGO CONSUMER LENDING
ONE HOME CAMPUS
DES MOINES IA 50328
3. WELLS FARGO HOME CENTER
ONE HOME CAMPUS
DES MOINES IA 50328
4. WELLS FARGO BANK, N.A.
1700 WELLS FARGO CENTER SIXTH AND MARQUETTE
MINNEAPOLIS MN 55402

WEISBERG LAW

Matthew B. Weisberg, Esq.
 Attorney ID No.: 85570
 Graham F. Baird, Esq.
 Attorney ID No.: 92692
 7 South Morton Ave.
 Morton, PA 19070
 610-690-0801
 (610) 690-0880 – Fax

THIS IS A MAJOR JURY MATTER
ASSESSMENT OF DAMAGES REQUIRED



Attorneys for Plaintiff

Josh Friedman and Jacalyn Friedman,
 Individually and as husband and wife
 2315 Hartranft St.
 Philadelphia, PA 19145

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY

Plaintiff,
 v.

Term, 2014

Wells Fargo Bank, NA
 1700 Wells Fargo Center
 Sixth and Marquette
 Minneapolis, MN 55402

JURY OF TWELVE (12) DEMANDED

Wells Fargo Home Mortgage
 One Home Campus
 Des Moines, IA 50328

And

Wells Fargo Consumer Lending
 One Home Campus
 Des Moines, IA 50328

And

James Linnane, c/o
 Wells Fargo Home Mortgage
 One Home Campus
 Des Moines, IA 50328

Defendants.

PRAECLPIE TO ISSUE WRIT OF SUMMONS

To the Prothonotary:

Kindly issue Summons as to Defendants, Wells Fargo Bank, NA; Wells Fargo Home Mortgage; Wells Fargo Consumer Lending and James Linnane in regards to the above-captioned matter.

WEISBERG LAW

/s/ Matthew B. Weisberg
Matthew B. Weisberg, Esquire
Graham F. Baird, Esquire
Attorneys for Plaintiff

CP.87

Commonwealth of Pennsylvania
CITY AND COUNTY OF PHILADELPHIA

SUMMONS
CITACION

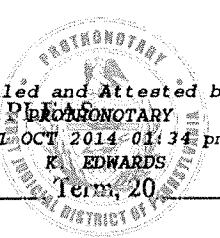
Josh Friedman and Jacalyn Friedman,
individually and as husband and wife

COURT OF COMMON PLEAS
PROTHONOTARY

31 OCT 2014 01:34 pm

K. EDWARDS

Term, 2014



No. _____

vs.

Wells Fargo Bank, N.A.; Wells Fargo Home
Mortgage; Wells Fargo Consumer Lending;
and James Linnane c/o Wells Fargo Home
Mortgage

To⁽¹⁾

Wells Fargo Bank, NA
1700 Wells Fargo Center
Sixth and Marquette
Minneapolis, MN 55402

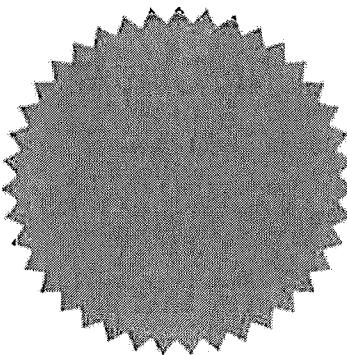
Wells Fargo Home Mortgage
One Home Campus
Des Moines, IA 50328

Wells Fargo Consumer Lending
One Home Campus
Des Moines, IA 50328

You are notified that the Plaintiff⁽²⁾
Usted esta avisado que el demandante⁽²⁾

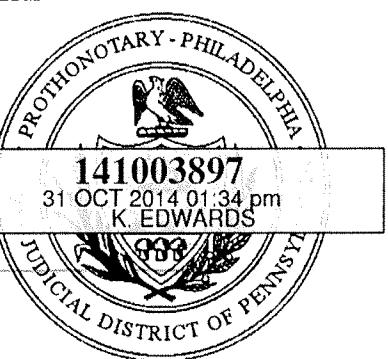
Josh Friedman and Jacalyn Friedman,
individually and as husband and wife
2315 Hartranft Street
Philadelphia, PA 19145

Has (have) commenced an action against you.
Ha (han) iniciado una accion en contra suya.



JOSEPH H. EVERES
Prothonotary

By _____



Date _____

(1) Name(s) of Defendant(s)
(2) Name(s) of Plaintiff(s)

ADDITIONAL DEFENDANTS

James Linnane, c/o
Wells Fargo Home Mortgage
One Home Campus
Des Moines, IA 50328

COURT OF COMMON PLEAS

____ Term, 20 ____ No. ____

Josh Friedman and Jacalyn Friedman, individually
and as husband and wife

vs.

Wells Fargo Bank, N.A.; Wells Fargo Home
Mortgage; Wells Fargo Consumer Lending; and
James Littman c/o Wells Fargo Home Mortgage

SUMMONS

EXHIBIT B

WEISBERG LAW

Matthew B. Weisberg, Esq.
 Attorney ID. #85570
 David A. Berlin, Esq.
 Attorney ID. #314400
 7 South Morton Ave.
 Morton, PA 19070
 610-690-0801
 (610) 690-0880 – Fax

THIS IS A MAJOR JURY MATTER**ASSESSMENT OF DAMAGES REQUIRED**

Attorneys for Plaintiffs

Josh Friedman & Jacalyn Friedman,
 Individually and as h/w
 2315 Hartranft St.
 Philadelphia, PA 19145

:

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY

Plaintiffs, :
 v. :

October Term, 2014

Wells Fargo Bank, NA
 1700 Wells Fargo Center
 Sixth and Marquette
 Minneapolis, MN 55402

:

NO.: 3897

And :

Wells Fargo Home Mortgage
 One Home Campus
 Des Moines, IA 50328

:

And :

Wells Fargo Consumer Lending
 One Home Campus
 Des Moines, IA 50328

:

And :

James Linnane, c/o
 Wells Fargo Home Mortgage
 One Home Campus
 Des Moines, IA 50328

:

JURY OF TWELVE (12) DEMANDED

Defendants. :

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Philadelphia Bar Association
One Reading Center
11th & Market Streets
Philadelphia, PA 19107
215-238-6333

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas ex-puestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

USTED LE DEBE TOMAR ESTE PAPEL A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE A UN ABOGADO, VA A O TELEFONEA LA OFICINA EXPUSO ABAJO. ESTA OFICINA LO PUEDE PROPORCIONAR CON INFORMATION ACERCA DE EMPLEAR A UN ABOGADO.

SI USTED NO PUEDE PROPORCIONAR PARA EMPLEAR UN ABOGADO, ESTA OFICINA PUEDE SER CAPAZ DE PROPORCIONARLO CON INFORMATION ACERCA DE LAS AGENCIAS QUE PUEDEN OFRECER LOS SERVICIOS LEGALES A PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO NI NINGUN HONORARIO.

Philadelphia Bar Association
One Reading Center
11th & Market Streets
Philadelphia, PA 19107
215-238-6333

WEISBERG LAW

Matthew B. Weisberg, Esq.
 Attorney ID. #85570
 David A. Berlin, Esq.
 Attorney ID. #314400
 7 South Morton Ave.
 Morton, PA 19070
 610-690-0801
 (610) 690-0880 – Fax

THIS IS A MAJOR JURY MATTER
ASSESSMENT OF DAMAGES REQUIRED

Attorneys for Plaintiffs

Josh Friedman & Jacalyn Friedman,
 Individually and as h/w
 2315 Hartranft St.
 Philadelphia, PA 19145

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY

Plaintiffs,

v. : October Term, 2014

Wells Fargo Bank, NA
 1700 Wells Fargo Center
 Sixth and Marquette
 Minneapolis, MN 55402

And : NO.: 3897

Wells Fargo Home Mortgage
 One Home Campus
 Des Moines, IA 50328

And

Wells Fargo Consumer Lending
 One Home Campus
 Des Moines, IA 50328

And

James Linnane, c/o
 Wells Fargo Home Mortgage
 One Home Campus
 Des Moines, IA 50328

JURY OF TWELVE (12) DEMANDED

Defendants.

CIVIL ACTION COMPLAINT

I. Parties

1. Plaintiffs Josh and Jacalyn Friedman, are husband and wife and are adult individuals currently residing at the above-captioned address.
2. Defendant, Wells Fargo Bank, NA is a business corporation organized and existing under the laws of the State of Minnesota doing substantial business in Philadelphia County Pennsylvania with a headquarters at the above captioned address.
3. Defendant, Wells Fargo Home Mortgage is a business corporation organized and existing under the laws of the State of Iowa doing substantial business in Philadelphia County Pennsylvania with a headquarters at the above captioned address.
4. Defendant, Wells Fargo Consumer Lending is a business corporation organized and existing under the laws of the State of Iowa doing substantial business in Philadelphia County Pennsylvania with a headquarters at the above captioned address.
5. Defendant James Linnane is an adult individual employed by and on behalf of Defendant Wells Fargo Home Mortgage, with a principal business address, as set forth above.
6. At all times material, Defendants, Wells Fargo Bank, NA, Wells Fargo Home Mortgage, Wells Fargo Consumer Lending and James Linnane (hereinafter ‘Defendants’) were acting by and through their agents, employees, workers and servants.

II. Operative Facts

7. On or about November 14, 2013, Plaintiff, Josh Friedman was terminated from employment by Defendants.
8. At the time of his termination, Josh Friedman was a retail sales manager working in the home mortgage department of Wells Fargo.

9. The reason for Plaintiff's termination was due to a purported violation of the Defendants' conflict of interest policy.

10. Plaintiff had obtained a letter for pre-approval for a purchase money home mortgage from Adam Sikoutris, an individual who was, according to Defendants, Plaintiffs' subordinate.

11. Plaintiff never used the pre-approval letter, nor originated a mortgage from Sikoutris, instead using Wells Fargo's "Home Team" program for employees to obtain approval for the mortgage, which Plaintiff obtained through Defendants and continues to pay.

12. However, due to this, Plaintiff was terminated.

13. At the time of Plaintiff's termination, he was owed approximately \$26,000 by Defendants for mortgage origination that he was never paid.

14. Further, long after Plaintiff's termination, Defendants continued to send emails and letters to Plaintiff's customers using Plaintiff's email address, NMLSR license registration and identification and name in furtherance of Defendants' business.

15. Plaintiff's customers reasonably believed these emails, letters and postcards were being sent by Plaintiff, even though he had been terminated from employment for weeks.

16. Defendants' used Plaintiff's name, email address and NMLSR license registration and identification without Plaintiff's permission, in furtherance of their business.

COUNT I
Invasion of Privacy—Intentional Tort
(Appropriation of Name and Likeness)

17. Plaintiffs incorporate by reference all prior paragraphs as if fully set forth at length herein.

18. Defendants' use of Plaintiffs' name, email address and likeness in furtherance of their business and without permission constitutes the appropriation of Plaintiffs' name and likeness.

19. Defendants' appropriation of Plaintiff's name, email address and likeness as set forth above constitute an invasion of privacy.

20. As a result of Defendant's appropriation of Plaintiff's name, email address and likeness, Plaintiffs have experienced a special harm resulting from such appropriation, i.e., embarrassment, humiliation and disgrace, loss of benefit of his good name and reputation.

WHEREFORE, Plaintiffs request this Honorable Court enter judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, and attorneys fees and costs, plus such other and further relief as this Honorable Court deems necessary and just.

COUNT II
Breach of Contract/ Covenant of Good Faith and Fair Dealing

21. Plaintiffs incorporate by reference all prior paragraphs as if fully set forth at length herein.

22. Defendants' aforementioned conduct constitutes a breach of the fee and other agreements, and the covenant of good faith and fair dealing, express, implied, and as a matter of law.

23. As a direct and proximate result of the aforesaid breach of the agreement, Plaintiffs have been damaged as set forth above.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifty thousand dollars (\$50,000.00), together with interest and costs and such other and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

COUNT III
Unjust Enrichment

24. Plaintiffs incorporate by reference all prior paragraphs as if fully set forth at length herein.
25. At set forth above, at the time of Plaintiff's termination, Defendants owed money in commissions, pay, bonuses and/or other benefits arising out of mortgages originated by Plaintiff, that Defendants have not paid to him.
26. Under the aforesaid circumstances, it would be inequitable for Defendants to retain any funds from the origination of mortgages which Plaintiff worked on, but was not paid for, or mortgages which were originated using Plaintiff's name and likeness subsequent to his termination.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifty thousand dollars (\$50,000.00), together with interest and costs and such other and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

COUNT IV
Lanham Act

27. Plaintiffs incorporate by reference all prior paragraphs as if fully set forth at length herein.
28. Defendants used Plaintiff's name, email address, likeness and NMLSR license registration without permission, in furtherance of Defendants' business.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifty thousand dollars

(\$50,000.00), together with interest and costs and such other and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

COUNT V
Loss of Consortium
(Jacalyn Friedman v. Defendants)

29. Plaintiffs incorporate the paragraphs above as if fully set forth at length herein.
30. As a result of Defendants' conduct, Plaintiff, Jacalyn Friedman has lost the companionship, society and services of her husband, Josh Friedman, to her great personal detriment and loss.

WHEREFORE, Plaintiffs demand judgment in their favor and against Defendants, individually, jointly and/or severally, in an amount in excess of fifty thousand dollars (\$50,000.00), together with interest and costs and such other and further relief as this Honorable Court deems necessary and just, including attorney's fees and costs.

WEISBERG LAW

/s/ Matthew B. Weisberg
Matthew B. Weisberg, Esquire
David A. Berlin, Esquire
Attorneys for Plaintiffs

WEISBERG LAW

Matthew B. Weisberg, Esq.
 Attorney ID. #85570
 David A. Berlin, Esq.
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 Morton, PA 19070
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THIS IS A MAJOR JURY MATTER
ASSESSMENT OF DAMAGES REQUIRED

Attorneys for Plaintiffs

Josh Friedman & Jacalyn Friedman, Individually and as h/w 2315 Hartranft St. Philadelphia, PA 19145	:	COURT OF COMMON PLEAS PHILADELPHIA COUNTY
Plaintiffs,	:	October Term, 2014
v.	:	
Wells Fargo Bank, NA, et al 1700 Wells Fargo Center Sixth and Marquette Minneapolis, MN 55402	:	NO.: 3897
Defendants.	:	JURY OF TWELVE (12) DEMANDED

CERTIFICATE OF SERVICE

I, Matthew B. Weisberg, Esquire, hereby certify that on this 25th day of June, 2015, a true and correct copy of the foregoing Civil Action Complaint was served via e-filing upon the following parties:

Gregory D. Hanscom, Esquire
 Michael R. Galey, Esquire
 Fisher & Phillips, LLP
 150 N. Radnor-Chester Rd., Suite C300
 Radnor, PA 19087

WEISBERG LAW

/s/ Matthew B. Weisberg
 Matthew B. Weisberg, Esquire
 Attorney for Plaintiff